



U.S. Department of Justice

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

July 24, 2023

**BY ECF**

The Honorable Paul A. Engelmayer  
United States District Court  
Southern District of New York  
United States Courthouse  
40 Foley Square  
New York, New York 10007

**Re: *United States v. Raheem Jones*, 15 Cr. 276 (PAE)**

Dear Judge Engelmayer,

The Government writes respectfully to request an adjournment of the conference scheduled for Monday, August 2, 2023, at 11:45 a.m. in the above-referenced case. The defendant currently is in state custody as his state case proceeds. The defendant has been charged in a superseding indictment, unsealed on July 20, 2023, with three counts: (1) murder in the second degree, in violation of NYPL § 125.25(1) (Count One); (2) criminal possession of a weapon in the second degree, in violation of NYPL § 265.03(1)(b) (Count Two); and (3) criminal possession of a weapon in the second degree, in violation of NYPL § 265.03(3) (Count Three). The conduct underlying Count Three also gave rise to the violation of supervised release pending before this Court.

The Government understands from Assistant District Attorney Kathleen Coulson, who is handling the prosecution of the charges in the superseding indictment described above in Supreme Court in New York County, that the defendant will have regular court appearances and likely a trial. Ms. Coulson has informed the Government that any delay, including delay caused by a parallel federal proceeding and the need to transfer the defendant back and forth from state and federal custody, will cause Speedy Trial issues and difficulty ensuring the continued cooperation and availability of civilian witnesses. Accordingly, the Government requests an adjournment of at least six months to permit the state case to proceed without delay. The Government submits

that permitting the state prosecution to proceed as such best serves the interest of justice here. The Government has conferred with defense counsel who consents to this adjournment request.

Respectfully,

DAMIAN WILLIAMS  
United States Attorney


by:   
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Lisa Daniels  
Assistant United States Attorney  
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cc: Defense Counsel (by ECF)

**GRANTED.** In deference to the paramount needs of the ongoing New York State prosecution of Mr. Jones, the Court adjourns Wednesday's VOSR conference in this case until **February 7, 2024 at 11:00 a.m.** The Court directs the Government promptly to notify the Court of any material changes to the state court schedule, as such may counsel moving earlier – or later – the VOSR conference date set here. The Clerk of Court is requested to terminate the motion at Dkt. No. 28.

7/24/2023

SO ORDERED.

  
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PAUL A. ENGELMAYER  
United States District Judge